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## BEFORE THE ARIZONA CORPORATION COMMISSION

BOB STUMP

Chairman

GARY PIERCE

Commissioner

BRENDA BURNS

Commissioner

BOB BURNS

Commissioner

SUSAN BITTER SMITH

Commissioner

Arizona Corporation Commission

DOCKETED

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IN THE MATTER OF THE APPLICATION  
OF Q LINK WIRELESS LLC FOR  
APPROVAL OF A CERTIFICATE OF  
CONVENIENCE AND NECESSITY FOR  
DESIGNATION AS AN ELIGIBLE  
TELECOMMUNICATIONS CARRIER IN  
THE STATE OF ARIZONA ON A  
WIRELESS BASIS (LOW INCOME ONLY).

DOCKET NO. T-20824A-11-0446

DECISION NO. 73651ORDER

Open Meeting  
January 30 and 31, 2013  
Phoenix, Arizona

BY THE COMMISSION:

FINDINGS OF FACT

1. On December 13, 2011, Q Link Wireless LLC ("Q Link") filed an Application requesting designation as an Eligible Telecommunications Carrier ("ETC") pursuant to section 214(e)(2) of the Communications Act of 1934 (the "Act") and the rules of the Federal Communications Commission ("FCC"), including 47 C.F.R. §§ 54.201 through 54.207. In its Application, Q Link requests that the Arizona Corporation Commission ("ACC" or "Commission") designate it as a wireless ETC for the purpose of receiving federal Universal Service Fund ("FUSF") support for low-income customers only (i.e., Lifeline<sup>1</sup>). Q Link is not requesting high cost support.

...

<sup>1</sup> Federal Lifeline Assistance provides discounts on basic monthly service at the primary residence for qualified telephone subscribers. The federal support amount provided to an ETC is \$9.25.

2. On February 9, 2012, Q Link filed an amendment to its application to withdraw its request for Link Up reimbursement.

3. On February 10, 2012, Q Link submitted its initial Compliance Plan to the FCC in order to benefit from the “blanket forbearance” of the own-facilities requirement used to provide Lifeline services.

4. On March 9, 2012, the Arizona Local Exchange Carriers Association (“ALECA”) filed a motion to intervene.

5. On March 30, 2012, a Procedural Order granted ALECA’s request for intervention in this proceeding.

6. On August 8, 2012, the FCC approved Q Link’s Third Revised Compliance Plan (“TRCP”) and waived the company owned-facilities requirement. On August 10, 2012, Q Link filed a copy of the TRCP in the docket.

7. On November 8, 2012, a Stipulation between ALECA and Q Link was filed in the docket.

## BACKGROUND

8. Q Link is a Delaware Limited Liability Company organized on August 25, 2011. Its principal office is located at 499 Sheridan Street, Suite 300, Dania, Florida 33004. Q Link provides Commercial Mobile Radio Service (“CMRS”) through the resale of service of other wireless carriers. Q Link currently serves just under 5,000 customers<sup>2</sup> in the states in which it operates, of which 90% are Lifeline customers, Q Link has been granted wireless ETC designation in nine (9) jurisdictions<sup>3</sup> with seventeen (17) applications pending in other jurisdictions.<sup>4</sup> Q Link states<sup>5</sup> it will provide wireless service through a “virtual network” provider, Boomerang Wireless, LLC dba Ready Mobile (“Ready Mobile”), consisting of services obtained from licensed wireless

<sup>2</sup> Response to Staff Data Request STF 2.1.

<sup>3</sup> Colorado, Maryland, Michigan, Missouri, Nevada, Oklahoma, Texas, West Virginia and Wisconsin.

<sup>4</sup> Arkansas, California, Georgia, Illinois, Kansas, Kentucky, Louisiana, Maine, Massachusetts, Minnesota, Mississippi, New Jersey, Ohio, Pennsylvania, South Carolina, Utah, and Federal ETC designation for Alabama, Connecticut, Delaware, Florida, New Hampshire, New York, North Carolina, Tennessee, the Commonwealth of Virginia and the District of Columbia.

<sup>5</sup> Response to Staff Data Request STF 1.15.

1 network operator Sprint PCS ("Sprint") and does not own or operate any of its own wireless  
2 facilities. Q Link's arrangement through Ready Mobile and its underlying wireless carrier Sprint  
3 enables it to offer services wherever the underlying wireless carriers offer service in the State of  
4 Arizona. Both non-rural and rural incumbent local exchange carriers ("ILECs") provide wireline  
5 service within these areas. For its proposed designated service area, Q Link provided a list of zip  
6 codes in which it will provide service and identified the ILEC(s) serving each zip code in its  
7 proposed tariff<sup>6</sup> (See Attachment 1).

8 9. On February 6, 2012, the FCC released an Order in FCC 12-11, *Lifeline and Link*  
9 *Up Reform and Modernization ("Lifeline Reform Order")*<sup>7</sup>, in which the FCC adopted  
10 comprehensive reforms to the low-income program to revise and modernize the Lifeline service  
11 requirements and implement measures to address fraud, waste and abuse of the FUSF. Within that  
12 Order, the FCC found that a grant of blanket forbearance of the requirement that an ETC use its  
13 own facilities ("the facilities requirement") subject to certain public safety and compliance  
14 obligations, was appropriate for carriers seeking to provide Lifeline-only service.<sup>8</sup> Specifically, in  
15 the *Lifeline Reform Order*, the FCC states it will conditionally grant forbearance from the Act's  
16 Section 214(e)(1)(A) facilities requirement to all telecommunications carriers seeking Lifeline-  
17 only ETC designation, subject to the following conditions: (1) compliance with certain 911 and  
18 enhanced 911 (E911) public safety requirements; and (2) FCC Wireline Competition Bureau  
19 approval of a compliance plan providing specific information regarding the carrier and its service  
20 offerings and outlining the measures the carrier will take to implement the obligations contained in  
21 the *Order*.<sup>9</sup>

22 10. On February 10, 2012, Q Link submitted its initial Compliance Plan to the FCC in  
23 order to benefit from the "blanket forbearance" of the own-facilities requirement used to provide

24  
25 <sup>6</sup> Response to Staff Data Request STF 1.52.

26 <sup>7</sup> *In the Matter of Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed*  
*Rulemaking*, WC Docket No. 11-42, FCC 12-11, released February 6, 2012 ("*Lifeline Reform Order*").

27 <sup>8</sup> *Ibid.*, at ¶¶ 368-381.

28 <sup>9</sup> *See id.* at ¶¶ 373 and 389. Subsequently, the Bureau provided guidance for carriers submitting compliance plans  
pursuant to the *Lifeline Reform Order*. *Wireline Competition Bureau Provides Guidance for the Submission of*  
*Compliance Plans Pursuant to the Lifeline Reform Order*, WC Docket Nos. 09-197 and 11-42, Public Notice, 27 FCC  
Rcd 2186 (Wireline Comp. Bur. 2012).

1 Lifeline services. Q Link submitted its TRCP on June 30, 2012, making changes as the result of  
2 discussions with FCC Staff. On August 8, 2012, in DA 12-1286, the FCC issued a Public Notice<sup>10</sup>  
3 approving Q Link's June 30, 2012 TRCP.

4 **REQUIREMENTS FOR DESIGNATION AS AN ETC AND Q LINK'S COMPLIANCE**  
5 **WITH THE REQUIREMENTS**

6 11. Designation as an ETC makes a carrier eligible to receive federal universal service  
7 funds. The requirements for designation of ETCs are specified by federal law in 47 U.S.C. §  
8 214(e)(1), which states:

9 "A common carrier designated as an eligible telecommunications carrier under paragraph  
10 (2) or (3) shall be eligible to receive universal service support in accordance with section  
11 254 and shall throughout the service area for which the designation is received: (A) offer  
12 the services that are supported by Federal universal service support mechanisms under  
13 section 254(c), either using its own facilities or a combination of its own facilities and  
14 resale of another carrier's services (including the services offered by another eligible  
15 telecommunications carrier); and (B) advertise the availability of such services and the  
16 corresponding charges using media of general distribution."

17 12. In order to be designated as an ETC, a carrier must offer Lifeline service to all  
18 qualifying low-income customers within its service area.<sup>11</sup> Lifeline service provides basic  
19 telephone service, typically by passing on discounts to monthly telecommunications charges. As a  
20 wireless reseller of prepaid wireless service, Q Link is proposing to offer qualified customers a  
21 free handset and the choice of three different free prepaid calling plans.<sup>12</sup>

22 13. As indicated above, the FCC granted Q Link forbearance from the facilities  
23 requirement that it provide service using its own facilities or a combination of its own facilities and  
24 resale of another carrier's service and also any criteria related to facilities build out plans. Q Link  
25 would be a Lifeline-only ETC, eligible only for Lifeline support and must meet all the other  
26 criteria required of ETCs.

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28 <sup>10</sup> See "Wireline Competition Bureau Approves the Compliance Plans of Birch Communications, Boomerang  
Wireless, IM Telecom, Q Link Wireless and TAG Mobile", Public Notice from FCC Wireline Competition Bureau,  
WC Docket Nos. 09-197 and 11-42 (rel. August 8, 2012).

<sup>11</sup> 47 C.F.R. §§ 54.405 and 54.411(a)

<sup>12</sup> See Application, page 4 and response to Staff Data Request STF 1.34. Q Link's offering of 68, 150 or 250 free  
monthly minutes to Lifeline customers mirrors the plans offered by TracFone (Decision No. 72222).

1           **A.       OFFERING THE SERVICES DESIGNATED FOR SUPPORT**

2           14.     On December 23, 2011, the FCC adopted and released an Order on Reconsideration  
3 in which the FCC modified, on its own motion, the definition of “voice telephony”, as adopted in  
4 the *USF/ICC Transformation Order*.<sup>13</sup> In that Order, the FCC reduced its former list of nine  
5 supported services to four supported services and amended 47 C.F.R. § 54.101 to specify the  
6 “voice telephony services” supported by federal universal service support mechanisms.<sup>14</sup>

7           15.     47 C.F.R. § 54.101, sets forth the services that a carrier must offer in order to  
8 receive Federal universal service fund support. The services and Q Link’s response to the  
9 provision of each service are as follows:

10           (a) Voice grade access to the Public Switched Network. “Voice grade access to the  
11 Public Switched Network” is defined as a functionality that enables a user of  
12 telecommunications services to transmit voice communications, including signaling the  
13 network that the caller wishes to place a call, and receive voice communications,  
14 including receiving a signal indicating there is an incoming call. For purposes of this  
Part, bandwidth for voice grade access should be, at a minimum, 300 to 3,000 Hertz.  
Q Link states<sup>15</sup> it provides voice grade access to the public switched telephone network  
 (“PSTN”) through the purchase of wholesale wireless services from Sprint.

15           (b) Local usage. “Local usage” means minutes of use for local exchange service,  
16 prescribed by the Federal Communications Commission, provided free of charge to end  
17 users. Q Link states<sup>16</sup> it will provide Lifeline customers with minutes of use for local  
service at no additional charge to customers.

18           (c) Access to emergency services. “Access to emergency services” includes access to  
19 services, such as 911 and enhanced 911, provided by local governments or other public  
20 safety organizations. 911 is defined as a service that permits a telecommunications  
21 user, by dialing the three-digit code “911”, to call emergency services through a Public  
22 Safety Access Point (“PSAP”) operated by the local government. “Enhanced 911” is  
23 defined as 911 service that includes the ability to provide automatic numbering  
information (“ANI”), which enables the PSAP to call back if the call is disconnected,  
and automatic location identification (“ALI”), which permits emergency service

24 <sup>13</sup> See *In the Matter of Connect America Fund, A National Broadband Plan for Our Future, Establishing Just and*  
25 *Reasonable Rates for Local Exchange Carriers, High-Cost Universal Service Support, Developing an Unified*  
26 *Intercarrier Compensation Regime, Federal-State Joint Board on Universal Service, Lifeline and Link-Up, Universal*  
*Service Reform-Mobility Fund*, WC Docket No. 10-90, GN Docket No. 09-51, WC Docket No. 07-135, WC Docket  
No. 05-337, CC Docket No. 01-92, CC Docket No. 96-45, WC Docket No. 03-109, WT Docket No. 10-208, Order on  
Reconsideration, FCC 11-189 (rel. Dec. 23, 2011) (*USF/ICC Transformation Order on Reconsideration*) at ¶ 3.

27 <sup>14</sup> *Id.* at ¶ 78; see also *id.* App. A at 536 (revising section 54.101(a) of the Commission’s rules); see 76 FR 73830,  
73870 (Nov. 29, 2011) (revising 47 C.F.R. § 54.101(a) with an effective date of December 29, 2011).

28 <sup>15</sup> Application, Page 11 and response to Staff Data Request STF 1.58.

<sup>16</sup> Application, Page 17.

providers to identify the geographic location of the calling party. "Access to emergency services" includes access to 911 and enhanced 911 services to the extent the local government in an eligible carrier's service area has implemented 911 or enhanced 911 systems. Q Link states<sup>17</sup> all its customers will have access to emergency calling services at the time Lifeline service is initiated, and such 911 and E911 access will be available from Q Link's handsets even if the account associated with the handset has no minutes remaining.

(d) Toll Limitation for Qualifying Low-Income Consumers. "Toll limitation denotes either toll blocking or toll control for eligible telecommunications carriers that are incapable of providing both services. For eligible telecommunications carriers that are capable of providing both services, 'toll limitation' denotes toll blocking and toll control."<sup>18</sup> In the *Lifeline Reform Order* the FCC relieved ETCs of the obligation to offer toll limitation services if their Lifeline offering does not distinguish in the pricing of toll and non-toll calls.<sup>19</sup> Q Link's wireless calling plans do not distinguish between non-toll (i.e., local) and toll. Q Link's prepaid plans include a specific number of minutes that cannot be exceeded. Therefore, customers cannot incur any charges for excessive toll calling or be disconnected for non-payment.

16. In its application, Q Link states it has the ability to provide all the supported services and functionalities required in the proposed ETC designated service area to all subscribers taking service under its Lifeline plan through arrangements with its underlying carrier. Based on the above information and explanations, Staff believes that Q Link meets this ETC designation criteria.

#### **B. ADVERTISING OF SUPPORTED SERVICES**

17. 47 U.S.C. § 214(e)(1)(B) requires a common carrier designated as an eligible telecommunications carrier to advertise the availability of such services and the corresponding charges using media of general distribution. Q Link states it will advertise the availability of its supported services and the corresponding rates and charges in a manner designed to inform the general public. Q Link's advertising will occur through a combination of media channels, such as direct mail, television and radio, in-store and outdoor signage, bus/public transit signage and print

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<sup>17</sup> Application, Page 5.

<sup>18</sup> 47 C.F.R. § 54.400(d).

<sup>19</sup> *Lifeline Reform Order*, ¶238.

1 advertising and the Internet.<sup>20</sup> Advertisements will be both English and Spanish. Q Link  
2 submitted examples of its advertisements in its TRCP to the FCC.<sup>21</sup>

3 18. Based on the information above and Q Link's advertising materials provided to  
4 Staff, Staff concludes that Q Link will advertise the availability of its supported services and the  
5 corresponding charges using media of general distribution as required by 47 U.S.C. §  
6 214(e)(1)(B). Staff believes that Q Link meets this ETC designation criteria.

7 **C. ADDITIONAL ETC REQUIREMENTS**

8 19. In addition to the requirements listed above, the FCC adopted, in the Lifeline  
9 Reform Order, comprehensive reforms to the low-income program to revise and modernize the  
10 Lifeline service requirements and implement measures to address fraud, waste, and abuse within  
11 the system. Below are the additional requirements and Q Link's response to each requirement.

12 **C.1 A Commitment and Ability to Provide Supported Services**

13 20. In 47 C.F.R. § 54.202(a)(1)(i) and (ii), the FCC required the applicant to:

14 (i) Certify that it will comply with the service requirements applicable to the  
15 support that it receives; and

16 (ii) Submit a five-year plan that describes with specificity proposed improvements  
17 or upgrades to the applicant's network throughout its proposed service area. Each  
18 applicant shall estimate the area and population that will be served as a result of the  
19 improvements. Except, a common carrier seeking designation as an eligible  
20 telecommunications carrier in order to provide supported services only under  
21 subpart E of this part does not need to submit such a five-year plan.<sup>22</sup>

22 21. Q Link states<sup>23</sup> it will comply with the service requirements applicable to the  
23 support that it receives. The requirement directing submissions of a formal network improvement  
24 plan under 47 C.F.R. § 54.202(a)(1)(ii) does not apply to Q Link because it is seeking only to  
25 ...

26 <sup>20</sup> Response to Staff Data Request STF 1.39 and 1.41.

27 <sup>21</sup> See Exhibit B of the TRCP.

28 <sup>22</sup> *Lifeline Reform Order*, ¶ 386.

<sup>23</sup> TRCP, page 21.

1 provide supported services under subpart E of this part, i.e. Lifeline only, and the FCC waived the  
2 facilities-based requirements for Q Link.

3 22. Based on the above information, Staff believes that Q Link meets this ETC  
4 designation criteria.

### 5 C.2 Remain Functional in Emergency Situations

6 23. In 47 C.F.R. § 54.202(a)(2), the FCC outlines the requirement that an ETC applicant  
7 demonstrate its ability to remain functional in emergency situations. Specifically, “an applicant  
8 must demonstrate that it has a reasonable amount of back-up power to ensure functionality without  
9 an external power source, is able to reroute traffic around damaged facilities, and is capable of  
10 managing traffic spikes resulting from emergency situations.”<sup>24</sup>

11 24. To demonstrate its ability to remain functional in emergency situations, Q Link  
12 states<sup>25</sup> it purchases wireless network services on a wholesale basis from Sprint, a large, national  
13 carrier that is itself subject to various regulatory requirements to remain functional in emergencies.  
14 Through Sprint, Q LINK provides to its customers the same ability to remain functional in  
15 emergency situations as currently provided by Sprint to its own customers, including access to a  
16 reasonable amount of backup power to ensure functionality without an external power source, the  
17 ability to reroute traffic around damaged facilities, and the capability of managing traffic spikes  
18 resulting from emergency situations.

19 25. Based on the above information, Staff concludes that Q Link has demonstrated its  
20 ability to remain functional in emergency situations by maintaining a reasonable amount of back-  
21 up power. Staff believes that Q Link meets this ETC designation criteria.

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24 ...

25 ...

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27 <sup>24</sup> *Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 05-46* (rel. March  
28 17, 2005) (“ETC Minimum Requirements Report and Order”), ¶ 25.

<sup>25</sup> Response to Staff Data Request STF 1.59.



**C.3 Satisfy Consumer Protection and Service Quality Standards**

26. In 47 C.F.R. § 54.202(a)(3), the FCC requires an ETC applicant to demonstrate its commitment to meeting consumer protection and service quality standards in its application...<sup>26</sup>

The sufficiency of other commitments will be considered on a case-by-case basis.

27. To demonstrate its ability to satisfy consumer protection and service quality standards, Q Link commits<sup>27</sup> to satisfying all such applicable state and federal requirements related to consumer protection and service quality standards. Specifically, Q LINK commits to comply with the Cellular Telecommunications and Internet Association's (CTIA) Consumer Code for Wireless Service as required by 47 C.F.R. § 54.202(a)(3). Q Link affirms its commitment to satisfy applicable consumer protection and service quality standards if certified as an ETC.<sup>28</sup>

28. Based on the above information, Staff believes that Q Link meets this ETC designation criteria.

**C.4 Lifeline-Only ETC Applicants – Financial and Technical Capability**

29. In 47 C.F.R. § 54.202(a)(4), the FCC requires a Lifeline-only ETC applicant to demonstrate that it is financially and technically capable of providing the Lifeline service in compliance with subpart E of this part. In the *Lifeline Reform Order*<sup>29</sup> the FCC provides guidance on specific information to be considered when determining if an applicant meets this requirement:

“...Among the relevant considerations for such a showing would be whether the applicant previously offered services to non-Lifeline customers, how long its has been in business, whether the applicant intends to rely exclusively on USF distributions to operate, whether the applicant receives or will receive revenue from other sources, and whether it has been subject to enforcement action or ETC revocation proceedings in any state.”

30. To demonstrate that Q Link is financially and technically capable of providing Lifeline service, Q Link states<sup>30</sup> is financially and technically capable of providing Lifeline-

<sup>26</sup> ETC Minimum Requirements Report and Order, ¶ 28.

<sup>27</sup> Application, Pages 16-17.

<sup>28</sup> TRCP, Page 21.

<sup>29</sup> See *Lifeline Reform Order*, ¶388.

<sup>30</sup> TRCP, Page 22.

1 supported services<sup>31</sup> and will provide service to both Lifeline and non-Lifeline customers in  
2 Arizona. Q Link intends to launch its retail and Lifeline wireless service simultaneously. Q Link  
3 states it has not been subject to enforcement action or ETC revocation proceedings in any state.  
4 Although Q Link's initial applications for ETC designation in Kentucky,<sup>32</sup> Massachusetts<sup>33</sup> and  
5 Texas<sup>34</sup> were dismissed without prejudice by the respective State Commissions for not meeting the  
6 own-facilities requirement, Q Link has since received approval of its FCC Compliance plan and  
7 forbearance of the own-facilities requirement and has refilled applications in each of these states.  
8 Q Link states<sup>35</sup> it is financially able to provide Lifeline-supported services and will not rely  
9 exclusively on USF disbursements to operate. Furthermore, the senior management of Q Link has  
10 great depth in the telecommunications industry and offers extensive telecommunications business  
11 technical and managerial expertise to the Company.<sup>36</sup> In addition, Q Link will also rely upon the  
12 managerial and technical expertise of its underlying carrier Sprint.

13 31. Having reviewed Q Link's financial statements, the technical experience of Q  
14 Link's senior management and based on the above information, Staff believes that Q Link meets  
15 this ETC designation criteria.

16 **C.5 Lifeline-Only ETC Applicants – Terms and Conditions of Lifeline**  
17 **Service Plans**

18 32. In 47 C.F.R. § 54.202(a)(5), the FCC requires an ETC applicant to submit  
19 information describing the terms and conditions of any voice telephony service plans offered to  
20 Lifeline subscribers, including details on the number of minutes provided as part of the plan,  
21 additional charges, if any, for toll calls, and rates for each such plan. To the extent the ETC offers  
22 plans to Lifeline subscribers that are generally available to the public, it may provide summary  
23

24  
25 <sup>31</sup> See Order at ¶ 387.

26 <sup>32</sup> Kentucky Public Service Commission, Case No. 2011-00480, Order issued 2/2/2012.

27 <sup>33</sup> Commonwealth of Massachusetts, Department of Telecommunications and Cable, D.T.C. 11-18, Order of Dismissal  
Without Prejudice, issued 2/22/2012.

28 <sup>34</sup> Public Utility Commission of Texas, Docket No. 40011, Order No. 6 issued 2/22/2012.

<sup>35</sup> TRCP, Page 22.

<sup>36</sup> TRCP, Exhibit D for key management resumes.

1 information regarding such plans, such as a link to a public Web site outlining the terms and  
2 conditions of such plans.

3 33. Q Link provided Staff with its informational tariff<sup>37</sup> in which it describes the calling  
4 plans for Lifeline subscribers, including the number of free minutes in each calling plan, along  
5 with the terms and conditions of Lifeline service as provided by Q Link. Based on the information  
6 contained in Q Link's informational tariff, Staff believes that Q Link meets this ETC designation  
7 criteria.

8 **D. STEPS TO LIMIT FRAUD, WASTE AND ABUSE OF THE FUSF**

9 34. In the *Lifeline Reform Order* the FCC adopted various new measures and revised or  
10 eliminated other existing measures in order to limit fraud, waste and abuse of the Federal  
11 Universal Service Fund ("FUSF"). These measures include establishing uniform eligibility criteria  
12 to qualify for Lifeline services, clarifying the restriction of one Lifeline telephone allowed per  
13 household, initial certification and annual re-certification of consumer eligibility, establishing a  
14 national lifeline accountability database to ensure and enforce the one-per-household requirement,  
15 total elimination of toll limitation support for wireless carriers and a tapered elimination of toll  
16 limitation support for landline ETCs, elimination of the Link Up subsidy except on federally-  
17 recognized tribal lands and establishing additional provisions for USAC audits.

18 35. In its TRCP, Q Link outlines the steps it will take to limit fraud, waste and abuse of  
19 the FUSF and to comply with all applicable Lifeline requirements and implement measures to  
20 prevent fraud, waste, and abuse.

21 **E. PUBLIC INTEREST DETERMINATION**

22 36. Under Section 214 of the Act, the FCC and state commissions must determine that  
23 an ETC designation is consistent with the public interest, convenience and necessity for rural  
24 areas. They also must consider whether an ETC designation serves the public interest consistent  
25 with Section 254 of the Act. Congress did not establish specific criteria to be applied under the  
26 public interest tests in Sections 214 or 254. The public interest benefits of a particular ETC  
27

28 <sup>37</sup> Response to Staff Data Request STF 1.52.

1 designation must be analyzed in a manner that is consistent with the purposes of the Act itself,  
2 including the fundamental goals of preserving and advancing universal service; ensuring the  
3 availability of quality telecommunications services at just, reasonable, and affordable rates; and  
4 promoting the deployment of advanced telecommunications and information services to all regions  
5 of the nation, including rural and high-cost areas.<sup>38</sup> Accordingly, before designating a carrier as an  
6 ETC, the Commission must make an affirmative determination that such designation is in the  
7 public interest, regardless of whether the applicant seeks designation in an area served by a rural or  
8 non-rural carrier.

9       37. Q Link states that by designating it as a wireless ETC in Arizona, it will serve the  
10 public interest and the needs of low-income customers in Arizona by increasing customer choice in  
11 the areas it serves. The public interest benefits associated with Q Link's wireless service include  
12 larger local calling areas (as compared to traditional wireline carriers), the convenience and  
13 personal security afforded by mobile telephone service, the opportunity for customers to receive a  
14 high-value wireless plan and emergency services in accordance with FCC Rules. Additionally,  
15 ETC status will promote universal service by allowing Q Link to offer wireless service to many  
16 low-income customers who may not be able to otherwise have service. Q Link's Lifeline calling  
17 plans are designed to provide service to Lifeline consumers who, due to credit or deposit  
18 requirements, may not be able to obtain telephone service from more traditional wireline and  
19 wireless service.

#### 20       **F. DESIGNATED SERVICE AREA**

21       38. The Commission must establish a geographic area for the purpose of determining  
22 universal service obligations and support mechanisms for each designated ETC. *See* 47 U.S.C. §  
23 214(e)(2); 47 C.F.R. § 54.201(b). Q Link requests that the Commission designate it as an ETC for  
24 service areas in Arizona. Through resale of wireless service provided by Sprint in Arizona, Q Link  
25 will provide Lifeline service in many zip codes in the State of Arizona, excluding tribal lands.

26 . . .

27

28 <sup>38</sup> *ETC Minimum Requirements Report and Order*, ¶ 40.

39. There are a number of zip codes that encompass both tribal lands and non-tribal lands. Some of the tribal lands are served by tribal-owned telephone companies and some of the tribal lands are served by non-tribally owned telephone companies. For those zip codes that encompass tribal lands, Q Link requested to serve only the non-tribal areas of the zip code. Attachment 1 is a list of each zip code served by Q Link.

**G. REPORTING REQUIREMENT FOR PREPAID WIRELESS DEACTIVATIONS**

40. Staff recommends that Q Link be required to provide a quarterly report to the ACC, to be filed in docket control as a Compliance item, summarizing the total number of customers with periods of inactivity greater than 60 days, but did not cancel service with Q Link, are no longer qualified for Lifeline service or who voluntarily deactivate service during that quarter. The purpose of this report is to monitor the number of deactivated customers so that Q Link does not continue to receive Lifeline reimbursement per handset for these customers every month from the Universal Service Administrative Company ("USAC"). In compiling the data for these reports, Q Link must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the deenrollment policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute usage. The quarterly report must also include the total number of Lifeline customers and, as separate items, the number of customers who voluntarily relinquish their Q Link provided Lifeline service, the number of customers who do not annually recertify their eligibility for Lifeline services and the number of customers deactivated for 60 days of inactivity.

**INTERVENOR**

**1. Arizona Local Exchange Carriers Association**

41. The Arizona Local Exchange Carriers Association is an association of telephone companies and member-owned cooperatives providing local exchange telecommunications services to customers in rural, high cost areas of Arizona. All of ALECA's members are "rural telephone companies" as defined by the Communications Act of 1934, as amended (the "Act") 47 U.S.C. § 153(37). In its Motion to Intervene, ALECA states, "Each ALECA member, including its Tribally-owned members, receives support from the Federal Universal Service Fund ("FUSF") in

1 the form of High Cost Support. Each member also provides discounted Lifeline telephone service  
2 and receives compensation for the discounts from the FUSF.” ALECA states it is concerned that  
3 Q Link’s offering may unfairly duplicate the similar offerings of its member companies, cause the  
4 FUSF requirements to grow to the point where its member companies’ FUSF compensation is  
5 endangered, and undermine public support for the FCC’s universal service programs.

## 6           2.       **Joint Stipulation**

7           42.       On November 8, 2012, ALECA and Q Link filed a Stipulation in the docket. In the  
8 Stipulation, to address the potential concerns expressed by ALECA, Q Link agreed not to provide  
9 Lifeline service to eligible residents residing on Federally-recognized Tribal Lands. In addition, Q  
10 Link agreed that its Lifeline enrollment application for Arizona will require an applicant to provide  
11 a street address and include a provision that requires an applicant to self-certify under penalty of  
12 perjury that they do not reside on Federally-recognized Tribal Lands.

## 13       **LINK UP**

14           43.       In its application, Q Link requested Link Up support. Federal Link Up Assistance  
15 pays one-half (up to a maximum of \$30) of the initial installation fee for a traditional, wireline  
16 telephone or activation fee for a wireless telephone for a primary residence. It also allows  
17 participants to pay any remaining amount owed on a deferred schedule, interest-free.

18           44.       In the Lifeline Reform Order, the FCC eliminated the Link Up program, effective  
19 April 1, 2012, with the exception of high cost ETCs serving Tribal lands.<sup>39</sup> In its Amendment to  
20 its Application, Q Link withdrew its request for Link Up support.<sup>40</sup> Given the FCC’s elimination  
21 of the Link Up program on non-tribal lands and Q Link’s withdrawal of its request for Link Up  
22 support, the Link Up support issue is moot and no longer needs to be addressed by this  
23 Commission.

## 24       **STAFF RECOMMENDATIONS**

25           45.       In addition to the conditions set forth by the FCC, Staff recommends Q Link’s  
26 Application for designation as an ETC be granted subject to the following conditions:

27  
28 <sup>39</sup> See Lifeline Reform Order, ¶245 and footnote 652.

<sup>40</sup> Amendment to Application, Page 1.

- a. Q Link shall file a tariff, in this docket, setting forth the rates, terms and conditions for its Lifeline service within thirty (30) days of a Commission Order in this matter;
- b. Q Link shall notify the Commission of any future changes to its rates, terms and/or conditions regarding its Lifeline offerings and file such changes in its tariff and amend its tariff in compliance with A.R.S. § 40-367;
- c. Q Link shall make available Lifeline services to qualifying low-income applicants in its ETC service area no later than ninety (90) days after a Commission decision in this matter and shall concurrently notify the Commission, by making a filing in Docket Control, in this docket, of the commencement date for such services;
- d. Q Link shall apprise the Commission of any customer complaints that may arise from its ETC service offerings by making a filing in Docket Control in this docket;
- e. Q Link shall provide a regulatory contact to the Commission by making a filing in Docket Control in this docket;
- f. In the event that Q Link requests to relinquish its ETC status and no longer provide Lifeline services, it must provide notice to both the Commission and its customers. Such notice(s) shall be in accordance with A.A.C. R14-2-1107;
- g. Q Link shall submit in Docket Control an annual report by April 15th of each year, beginning April 15, 2014, that contains its total number of Lifeline subscribers, total amount of Federal USF support received and an affidavit stating that the Lifeline discounts or the equivalent are equal to the amount of total Federal USF support per line. The annual filing shall be submitted as a compliance item in this docket;
- h. Q Link shall submit in Docket Control, as a compliance item in this docket, a quarterly report detailing the total number of Lifeline customers, the total number of customers removed from the customer base due to 60-day inactivity, the number of customers removed from the customer base due to annual verification and the total number of customers who voluntarily relinquished Lifeline service. In compiling the data for these reports, Q Link must comply with 47 C.F.R. §54.405(e)(3), in which the FCC outlines the de-enrollment policy for non-usage and 47 C.F.R. §54.407(c), in which the FCC defines activities that constitute usage. The quarterly report should be submitted as a compliance item in this docket on the 15<sup>th</sup> of the month following the end of each calendar quarter, beginning July 15, 2013, or with the first complete quarter following the offering of prepaid Lifeline calling plans, whichever is earlier;
- i. In the event of a transfer of control that involves Q Link, a new ETC petition shall be filed with the Commission. This will ensure ETCs undergoing reorganization remain financially viable and able to provide the supported services throughout the designated service areas as originally approved by the Commission; and

- 1           j. Q Link shall not expand its Lifeline service beyond the designated service area  
2           specified in this application without acquiring ETC designation from the  
3           Commission to serve the additional area.

4                                   CONCLUSIONS OF LAW

5           1.       Q Link Wireless, LLC is a telecommunications company as defined in A.R.S. § 40-  
6           201(46) and is a “telecommunications carrier” as defined in 47 U.S.C. § 153(51). Q Link is also a  
7           reseller of Commercial Mobile Radio Service as defined in 47 U.S.C. § 20.3 and A.A.C. R14-2-  
8           1201(8).

9           2.       The Commission has jurisdiction over the subject matter of the application.

10          3.       Under 47 U.S.C. § 214(e)(1), a common carrier that is designated as an Eligible  
11          Telecommunications Carrier must, throughout its designated service area, offer the services that  
12          are supported by the Federal Universal Service Support mechanisms either by using its own  
13          facilities or a combination of its own facilities and resale of another carrier’s services. The carrier  
14          must also advertise the availability of such services and the rates for the services using media of  
15          general distribution.

16          4.       Under 47 U.S.C. § 214(e)(2), the Commission must establish the geographic area  
17          for the purposes of determining universal service obligations and support mechanisms. Q Link’s  
18          application applies to the designated service area consisting of the zip codes listed in Attachment  
19          1, excluding Federally-Recognized Tribal Lands located within the state of Arizona.

20          5.       Q Link meets the requirements for ETC designation under 47 U.S.C. § 214 and  
21          C.F.R. § 54.201 *et seq.*, subject to Q Link’s compliance with the conditions set forth in Finding of  
22          Fact No. 45 herein.

23          ...

24          ...

25          ...

26          ...

27          ...

28          ...



ORDER

IT IS THEREFORE ORDERED that the application of Q Link Wireless, LLC for designation as an Eligible Telecommunications Carrier pursuant to U.S.C. § 214(e)(1) for the purpose of receiving federal universal service support in Arizona, for the service area set forth in Attachment 1 attached hereto and incorporated herein by reference, be and hereby is approved, subject to Q Link Wireless, LLC's compliance with the conditions set forth in Finding of Fact No. 45 above.

IT IS FURTHER ORDERED that if Q Link Wireless, LLC does not comply with the requirements of Finding of Fact No. 45, its designation as an ETC may be revoked after due process.

IT IS FURTHER ORDERED that this Decision shall become effective immediately.

**BY THE ORDER OF THE ARIZONA CORPORATION COMMISSION**  
CHAIRMAN  
COMMISSIONER  
COMMISSIONER  
COMMISSIONER  
COMMISSIONER

IN WITNESS WHEREOF, I, JODI JERICH, Executive Director of the Arizona Corporation Commission, have hereunto, set my hand and caused the official seal of this Commission to be affixed at the Capitol, in the City of Phoenix, this 6<sup>th</sup> day of February, 2013.

  
JODI JERICH  
EXECUTIVE DIRECTOR

DISSENT: \_\_\_\_\_

DISSENT: \_\_\_\_\_

SMO:LLM:sms\MAS

1 SERVICE LIST FOR: Q LINK WIRELESS, LLC.  
2 DOCKET NO. T-20824A-11-0446

3 Mr. Giancarlo Estrada  
4 The Kris Mayes Law Firm, PLLC  
5 One East Camelback Road, Suite 550  
6 Phoenix, Arizona 85012

7 Mr. Lance J.M. Steinhart  
8 Lance J.M. Steinhart, P.C.  
9 1725 Windward Concourse, Suite 150  
10 Alpharetta, Georgia 30005

11 Mr. Craig A. Marks  
12 Craig A. Marks, PLC  
13 10645 N. Tatum Blvd., Suite 200-676  
14 Phoenix, Arizona 85028

15 Mr. Steven M. Olea  
16 Director, Utilities Division  
17 Arizona Corporation Commission  
18 1200 West Washington Street  
19 Phoenix, Arizona 85007

20 Ms. Janice M. Alward  
21 Chief Counsel, Legal Division  
22 Arizona Corporation Commission  
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24 Phoenix, Arizona 85007  
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# ATTACHMENT 1

## ATTACHMENT 1

		Q LINK WIRELESS, LLC			
		Coverage Area by Zip Code			Tribal Lands Covered
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc
85001	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85002	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85003	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85004	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85005	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85006	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85007	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85008	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85009	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85010	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85011	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85012	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85013	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85014	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85015	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85016	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85017	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85018	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85019	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85020	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85021	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85022	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85023	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85024	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85025	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85026	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85027	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85028	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85029	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85030	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85031	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85032	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85033	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85034	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85035	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85036	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85037	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85038	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85040	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602
85041	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602

## ATTACHMENT 1

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85042	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85043	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85044	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85045	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85046	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85048	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85050	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85051	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85053	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85054	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85055	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85060	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85061	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85062	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85063	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85064	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85065	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85066	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85067	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85068	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85069	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85070	Laveen	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85071	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85072	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85074	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85075	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85076	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85078	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85079	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85080	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85082	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85083	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85085	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85086	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85087	New River	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85096	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85097	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85098	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85099	Phoenix	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85117	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

## ATTACHMENT 1

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85118	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85119	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85120	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85121	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.	
85122	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85123	Arizona City	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85127	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85128	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.	
85130	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85131	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85132	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85138	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85139	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85140	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85141	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85142	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85143	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85145	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85172	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85178	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85190	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85191	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85193	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85194	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85201	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85202	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85203	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85204	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85205	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85206	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85207	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85208	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85209	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85210	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85211	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85212	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85213	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85214	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85215	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85216	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

## ATTACHMENT 1

Q LINK WIRELESS, LLC						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85217	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85218	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85219	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85220	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85221	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85222	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority
85223	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85224	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85225	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85226	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85227	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85228	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85230	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Tohono O'odham Utility Authority
85231	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85232	Florence	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85233	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85234	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85236	Higley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85238	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85239	Maricopa	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85240	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85241	Eloy	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	
85242	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85243	Queen Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85244	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85245	Red Rock	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85246	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85247	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85248	Chandler	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520	Gila River Telecomm, Inc.
85249	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85250	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85251	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85252	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85253	Paradise Valley	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85254	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85255	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85257	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85258	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85259	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85260	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	

## ATTACHMENT 1

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85261	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85263	Rio Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85266	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85267	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85268	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85269	Fountain Hills	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85271	Scottsdale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85272	Stanfield	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85274	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85275	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85277	Mesa	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85278	Apache Junction	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85280	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85281	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85282	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85283	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85284	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85285	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85286	Chandler	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85287	Tempe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85291	Coolidge	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85293	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85294	Casa Grande	AZ	Phoenix_AZ	PHXCGR520	CASA GRANDE, AZ 520		
85295	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85296	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85297	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85298	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85299	Gilbert	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85301	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85302	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85303	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85304	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85305	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85306	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85307	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85308	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85309	Luke AFB	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85310	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85311	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85312	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		



## ATTACHMENT 1

		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85318	Glendale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85322	Arlington	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85323	Avondale	AZ	Phoenix_AZ	PHXGGR520	CASA GRANDE, AZ 520		
85326	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85327	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85328	Cibola	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85329	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85331	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85333	Dateland	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85334	Cibola	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85335	El Mirage	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85336	Somerton	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85337	Gila Bend	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85338	Goodyear	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85339	Laveen	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85340	Litchfield Park	AZ	Phoenix_AZ	PHXGGR520	CASA GRANDE, AZ 520		
85342	Morristown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85343	Palo Verde	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85345	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85346	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85349	Somerton	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85350	Somerton	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85351	Sun City	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85352	Wellton	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85353	Tolleson	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85354	Tonopah	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85355	Waddell	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85358	Wickenburg	AZ	Phoenix_AZ	PHXWCB928	WICKENBURG, AZ 928		
85359	Parker	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85360	Lake Havasu City	AZ	LakeHavasucity_AZ	NMXXLHC520	LAKE HAVASU CITY, NV 520		
85361	Wittmann	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85363	Youngtown	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85364	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85365	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85366	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85367	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85369	Yuma	AZ	Yuma_AZ	NMXYUM520	YUMA, AZ 520		
85372	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85373	Sun City	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		
85374	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602		

Gila River Telecomm, Inc.

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Q LINK WIRELESS, LLC						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85375	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85376	Sun City West	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85377	Cave Creek	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85378	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85379	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85380	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85381	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85382	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85383	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85385	Peoria	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85387	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85388	Surprise	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85392	Avondale	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85395	Goodyear	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85396	Buckeye	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85502	Globe	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85532	Miami	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	Gila River Telecomm, Inc.
85547	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85553	Payson	AZ	Phoenix_AZ	PHXPHX602	PHOENIX, AZ 602	
85603	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85605	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85606	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85608	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85609	Cochise	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85613	Fort Huachuca	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85614	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85616	Huachuca City	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85617	MC Neal	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85618	Mammoth	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85619	Mount Lemmon	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85620	Bisbee	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85622	Green Valley	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85623	Oracle	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85626	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85627	Benson	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85628	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85629	Sahuarita	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85630	Saint David	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	
85631	San Manuel	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85632	San Simon	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	

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Q LINK WIRELESS, LLC						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
85635	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85636	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85640	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85641	Vail	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85644	Willcox	AZ	SierraVista_AZ	NMXWLC520	WILLCOX, AZ 520	
85645	Amado	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85646	Tumacacori	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85648	Rio Rico	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85650	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85652	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85653	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85654	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85655	Douglas	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85658	Marana	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85662	Nogales	AZ	Phoenix_AZ	PHXNOG520	NOGALES, AZ 520	
85670	Sierra Vista	AZ	SierraVista_AZ	NMXSVT520	SIERRA VISTA, AZ 520	
85701	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85702	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85703	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85704	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85705	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85706	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85707	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85708	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85709	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85710	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85711	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85712	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85713	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85714	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85715	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85716	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85717	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85718	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85719	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85721	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85722	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85723	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85724	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	
85725	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520	

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		Q LINK WIRELESS, LLC					
		Coverage Area by Zip Code					
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered	
85726	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85728	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85730	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85731	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85732	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85733	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85734	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85735	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85737	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85738	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85739	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85740	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85741	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85742	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85743	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85744	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85745	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85746	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85747	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85748	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85749	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85750	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85751	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85752	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85754	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85755	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85756	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85757	Tucson	AZ	Phoenix_AZ	PHXTUC520	TUCSON, AZ 520		
85942	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86002	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86003	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86004	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86011	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86015	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86017	Flagstaff	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86018	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86023	Williams	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86025	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86028	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		
86029	Holbrook	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520		

## ATTACHMENT 1

Q LINK WIRELESS, LLC						
Coverage Area by Zip Code						
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
86032	Winslow	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86301	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86302	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86304	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86312	Prescott Valley	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86313	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86314	Prescott Valley	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86315	Prescott Valley	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86320	Ash Fork	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	
86322	Camp Verde	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86325	Cornville	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86326	Cottonwood	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86327	Dewey	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86329	Dewey	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86330	Prescott	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86331	Clarkdale	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86333	Mayer	AZ	Flagstaff_AZ	NMXPRE520	PRESCOTT, AZ 520	
86335	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86339	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86340	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86341	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86342	Rimrock	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86351	Sedona	AZ	Flagstaff_AZ	NMXSED520	SEDONA, AZ 520	
86402	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86403	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86404	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86405	Lake Havasu City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86409	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86412	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86413	Golden Valley	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86426	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86427	Fort Mohave	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86429	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86430	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86431	Kingman	AZ	LakeHavasuCITY_AZ	NMXKGM520	KINGMAN, AZ 520	
86436	Topock	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86438	Bullhead City	AZ	LakeHavasuCITY_AZ	NMXLHC520	LAKE HAVASU CITY, NV 520	
86439	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	
86440	Mohave Valley	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	Fort Mohave Telecomm, Inc.
86446	Bullhead City	AZ	LasVegas_NV	NEVBUL520	BULLHEAD CITY, AZ 520	

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			Q LINK WIRELESS, LLC			
			Coverage Area by Zip Code			
Zipcode	Zip_Postal_City	State	Mkt_Name	CSA_Leaf	CSA_Desc	Tribal Lands Covered
86506	Ganado	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86512	Chambers	AZ	Flagstaff_AZ	NMXFLA520	FLAGSTAFF, AZ 520	Table Top Tel Company, Inc.
86555	Douglas	AZ	SierraVista_AZ	NMXBNS520	BENSON, AZ 520	